

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PANKAJ SHARMA,

Plaintiff,

v.

VIVIAN LIU

Defendant.

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Civil Action No. 20-20268

**DECLARATION OF SAMUEL
B. FINEMAN, ESQUIRE**

Electronically Filed

I, **SAMUEL B. FINEMAN**, declare as follows:

1. I am an attorney at law of the State of New Jersey and a partner with the law firm of Cohen Fineman, LLC, attorney for Plaintiff, Pankaj Sharma, in the above captioned matter. I submit this declaration in support of Plaintiff's Partial Motion to Seal the Record of this matter.

2. All documents attached hereto are true and accurate copies of the originals.

3. Plaintiff seeks to seal the following documents: Docket Record Nos. 1 (Notice of Removal), 6 (Motion to Dismiss), 7 (Amended Complaint), 8 (Motion to Dismiss), 10 (Memorandum in Opposition to Motion), 15 (Response in Support of Motion) and 24 (Order on Motion to Dismiss).

4. The declarant relies on the Declaration of Plaintiff Pankaj Sharma in support of this Partial Motion to Seal.

5. The undersign asserts that the delay in filing this motion was not due to Plaintiff, but rather a medical issue that the undersigned was facing.

6. Plaintiff's Partial Motion to Seal rests on the assertions that (1) the facts contained in the pleadings are private in nature and the public does not benefit from their public dissemination

or observation; and, (2) that Plaintiff will be prejudiced and caused serious injury to him mentally, physically and professionally if the Court does not enforce the proposed Order that the record documents referenced, *supra*, be sealed from the public.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: April 8, 2024

/s/ Samuel B. Fineman
Samuel B. Fineman, Esquire
NJ Bar ID: 005381999